

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

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SECURITIES AND  
EXCHANGE COMMISSION,

Plaintiff,

v.

JEFFREY R. NEUFELD and  
PARIDON CAPITAL MANAGEMENT LLC  
f/k/a TRITONE CAPITAL MANAGEMENT, LLC

Defendants.

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Case No.: 10-CV-2399

Judge John F. Grady

Magistrate Judge Nolan

**PLAINTIFF'S MOTION FOR ENTRY OF AGREED JUDGMENT FOR  
PERMANENT INJUNCTIONS AND DISGORGEMENT**

Plaintiff Securities and Exchange Commission (the "Commission") respectfully moves this Court for entry of the proposed agreed judgment for permanent injunctions and disgorgement for Defendants Jeffrey R. Neufeld ("Neufeld") and Paridon Capital Management, LLC f/k/a Tritone Capital Management, LLC ("Paridon") (collectively, the "Defendants"), a copy of which is attached as Exhibit 1. In support of the motion, the Commission states as follows:

1. On April 19, 2010, the Commission filed a Complaint against Defendants for violating the federal securities laws. (Docket No. 1) The Commission alleges that Paridon, an unregistered investment adviser, and its owner, Neufeld, fraudulently operated the TCM Global Strategy Fund, LP an unregistered investment commodity pool, by reporting false and fictitious rates of returns and assets under management to investors and prospective investors. The Court entered a Preliminary Injunction Order on April 21, 2010.

2. The proposed Judgment, among other things, permanently enjoins Defendants from violating Section 17(a) of the Securities Act of 1933, Sections 10(b) of the Securities Exchange Act of 1934 and Rule 10b-5 thereunder, Sections 206(1), 206(2), 206(3), and 206(4) of the Advisers Act and Rule 206(4)-8 thereunder. The Judgment also orders Defendants to pay \$53,182.33 in disgorgement and prejudgment interest to an investor in the Paridon Currency Fund, LP, an unregistered investment pool also managed by Defendants.

3. Defendants executed a consent to the entry of the proposed Judgment, a copy of which is attached hereto as Exhibit 2.

4. The entry of the proposed Judgment obviates the need for a hearing on the merits and conserves judicial resources.

5. The proposed Judgment does not impose civil penalties. The parties will continue to work together to resolve this issue. However if the parties cannot agree, the proposed Judgment provides that the Court shall determine the appropriateness and the amount of the civil penalty.

Dated: March 25, 2011

Respectfully submitted,

By: /s/ Andrew Shoenthal

Andrew Shoenthal  
Linda T. Ieleja  
Gregory von Schaumburg  
175 West Jackson Blvd., Suite 900  
Chicago, Illinois 60604  
Telephone: (312) 353-7390  
Facsimile: (312) 353-7398

*Attorneys for the Plaintiff Securities and  
Exchange Commission*

**CERTIFICATE OF SERVICE**

I hereby certify that, on March 25, 2011, I caused a copy of the foregoing **Plaintiff's Motion for Entry of Agreed Judgment for Permanent Injunctions and Disgorgement** to be served upon the following counsel by the Court's ECF system and email:

Jason S. Lewis (jlewis@lockelord.com)  
Jason M. Hopkins (jhopkins@lockelord.com)  
Locke Lord Bissell & Liddell LLP  
2200 Ross Avenue, Suite 2200  
Dallas, Texas 75201

Julie C. Webb (jwebb@lockelord.com)  
Locke Lord Bissell & Liddell LLP  
111 South Wacker Drive  
Chicago, Illinois 60606

**/s/ Andrew Shoenthal**  
Andrew Shoenthal